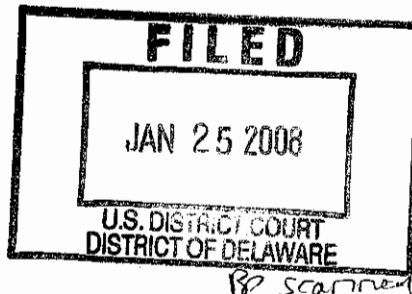


In the U.S. District Court for the District of Delaware

Xianhua Zhang
Plaintiff

vs.

ING Direct
Defendant



Case No. 07-555

Jury Trial Demanded

Request to Enter Default Judgment

Please enter default against defendant ING Direct pursuant to Federal Rules of Civil Procedure Rule 12.

Defendant received the request for Waiver of Service of Summons Form from Plaintiff on 10/31/2007 and signed the Form on 11/6/2007. But Defendant did not file the Answer until 1/7/ 2008. It violates Federal Rules of Civil Procedure Rule 12.

(A) A defendant must serve an answer:

(ii) if it has timely waived service under Rule 4(d), within 60 days after the request for a waiver was sent, or within 90 days after it was sent to the defendant outside any judicial district of the United States.

WHEREFORE, Plaintiff, Xianhua Zhang, requests that the Court enter Default Judgment against Defendant ING Direct.

Respectfully submitted,

Xianhua Zhang
Xianhua Zhang

Plaintiff

Date: 1/23/2008